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10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 KRISTINA KERLUS, individually,

13 Plaintiff,

14 vs.

15 DR. JENNIFER CORNEAL, in her individual
capacity; A. SANTOS, in her individual
16 capacity; CITY OF LAS VEGAS, a Municipal
corporation; and COUNTY OF CLARK, a
Municipal corporation; LAS VEGAS
17 METROPOLITAN POLICE DEPARTMENT,
jointly and severally

18 Defendants.
19

Case No.: 2:24-cv-02352-APG-DJA

**STIPULATION TO EXTEND TIME TO
FILE A RESPONSE TO LAS VEGAS
METROPOLITAN POLICE
DEPARTMENT’S MOTION TO DISMISS
[ECF No. 44]**

(Second Request)

20 Defendant, Las Vegas Metropolitan Police Department (“LVMPD”), by and through its
21 counsel, Lyssa S. Anderson, and Plaintiff, Kristina Kerlus (“Plaintiff”), by and through her
22 counsel, Patrick Driscoll, stipulate and agree to extend the current deadline of June 24, 2025, for
23 Plaintiff to file a Response to Las Vegas Metropolitan Police Department’s Motion to Dismiss
24 [ECF No. 44] for an additional thirty (30) days, which will create a new deadline of **July 24, 2025**.

1 1. On May 27, 2025, Defendant Las Vegas Metropolitan Police Department
2 (“LVMPD”) filed a Motion to Dismiss. [ECF No. 44].

3 2. On June 4, 2025, the parties filed a Stipulation, Request and Order Extending Time
4 to Respond to Defendant LVMPD’s Motion to Dismiss [ECF No. 44] (First Request). [ECF No.
5 52]. The parties sought an extension of the deadline for Plaintiff to respond to the Motion to
6 Dismiss until June 24, 2025.

7 3. On June 5, 2025, the Court granted the Stipulation. [ECF No. 53].

8 4. On June 18, 2025, the parties held a telephone conference where counsel for
9 Plaintiff indicated that they would be seeking leave to amend the operative complaint based upon
10 certain circumstances associated with its filing.

11 5. Federal Rule of Civil Procedure 6(b) and Local Rule IA 6-1 impose a good cause
12 standard to extend the deadline file a response to the Motion to Dismiss. “‘Good cause’ is a non-
13 rigorous standard that has been construed broadly across procedural and statutory contexts.”
14 *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1259 (9th Cir. 2010).

15 6. Good cause exists to extend the deadline for Plaintiff to file a response to the
16 Motion to Dismiss based upon the representation by Plaintiff’s counsel that they intend to seek
17 leave to amend the complaint. While LVMPD Defendants neither stipulate to the amendment of
18 the Complaint, nor waive their rights associated with the pending Motion to Dismiss, allowing
19 Plaintiff to seek leave from the Court before responding to the Motion will conserve the
20 expenditure of fees and judicial economy in the event that the Court permits amendment.

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DATED this 23rd day of June, 2025.

KAEMPFER CROWELL

PAUL PADDA LAW

By: /s/ Lyssa S. Anderson
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ORDER

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

Dated: _____